

\*\*\* CONFIDENTIAL ATTORNEYS EYES ONLY \*\*\*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SURGICAL INSTRUMENT SERVICE )  
COMPANY, INC., ) Case No.:  
 ) 3:21-cv-03496-VC  
Plaintiff, )  
 ) Lead Case No.:  
vs. ) 3:21-cv-03825-VC  
 )  
INTUITIVE SURGICAL, INC., ) Pages 1 to 65  
 )  
Defendant )  
\_\_\_\_\_)  
IN RE: DA VINCI SURGICAL ROBOT )  
ANTITRUST LITIGATION )  
\_\_\_\_\_)  
THIS DOCUMENT RELATES TO: )  
ALL ACTIONS )  
\_\_\_\_\_)

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DEPOSITION OF:  
KEITH ROBERT JOHNSON  
IN HIS PERSONAL CAPACITY  
THURSDAY, OCTOBER 27, 2022  
1:27 p.m.

REPORTED BY:  
Vickie Blair  
CSR No. 8940, RPR-CRR  
JOB NO. 5539883  
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Deposition of KEITH ROBERT JOHNSON, the witness, taken  
on behalf of the Defendant, on Thursday,  
October 27, 2022, 1:27 p.m., before VICKIE BLAIR,  
CSR No. 8940, RPR-CRR.

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1 your answers about that timeline be roughly the same? 14:52:00

2 MR. CHAPUT: Object to the form. 14:52:06

3 THE WITNESS: Yes, I'm -- I'm -- I'm a 14:52:09

4 sales guy, I'm looking for opportunities to sell. This 14:52:11

5 robotic program created an opportunity for SIS to 14:52:15

6 substantially increase the revenue of our organization, 14:52:18

7 a great opportunity, and that was what I -- I was -- I 14:52:20

8 was pumped about the opportunity. 14:52:24

9 BY MR. SNYDER: 14:52:25

10 Q Let's -- let's go -- let's go there next. 14:52:29

11 I just have a few questions. 14:52:33

12 This morning I believe you used the word 14:52:35

13 "monumental" in connection with the level of interest 14:52:41

14 in EndoWrist repair. 14:52:43

15 Is that a word that you used in that 14:52:44

16 context, Mr. Johnson? 14:52:46

17 A I believe I did, and I don't use that word 14:52:48

18 very often. 14:52:50

19 Q And are -- are there -- are there key -- 14:52:53

20 key moments or key events that you have in mind when 14:53:01

21 you refer to the monumental level of interest in 14:53:05

22 EndoWrist repair? 14:53:08

23 MR. CHAPUT: Object to the form. 14:53:11

24 THE WITNESS: Yeah, there's -- there's a 14:53:12

25 couple very distinct meetings that stick out in my 14:53:16

1 head, yes. 14:53:18

2 BY MR. SNYDER: 14:53:20

3 Q And what -- what are those -- those 14:53:20

4 meetings that stick out? 14:53:26

5 A One of the biggest ones was the meeting 14:53:27

6 that we had with Advocate Aurora in Wisconsin. I'll 14:53:35

7 just say this, in -- in -- in every meeting that I had, 14:53:46

8 and I'm not saying some of them, I'm saying all of 14:53:50

9 them, the -- the level of interest from the people that 14:53:52

10 I met with, which was always usually the C-suite, VP of 14:53:58

11 supply chain, VP of perioperative services, chief 14:54:02

12 robotic surgeon, one of those groups, every single one 14:54:07

13 of them was absolutely excited about this program. 14:54:10

14 Every one of them used the word 14:54:15

15 "hemorrhage;" almost all -- I won't say every one, a 14:54:17

16 majority of the people I meet with said "We hemorrhage 14:54:23

17 money to Intuitive Surgical. We are looking for ways 14:54:28

18 to reduce costs." 14:54:30

19 They love the robot. They do. They all 14:54:31

20 love it. They understand what it does. 14:54:34

21 It's -- it's the -- the lack of being able 14:54:36

22 to bring these other services that we were offering to 14:54:37

23 the table to help them reduce their costs, and that was 14:54:41

24 what they were excited about. 14:54:44

25 Q A couple other names that came up earlier 14:54:51

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1       how large Vizient is? I mean, you said they're the 14:56:11

2       largest, but what does that mean? 14:56:15

3               A       Yeah, they represent, don't quote me 14:56:16

4       specifically, but they represent somewhere between 14:56:19

5       2,500 and 3,000 hospitals. 14:56:22

6               Q       And what -- what's Vizient's geographic 14:56:24

7       scope? 14:56:29

8               A       National, every state in the union. 14:56:29

9               Q       Another -- another name that I believe 14:56:36

10       came up earlier today was Johns Hopkins. 14:56:37

11               Did you mention Johns Hopkins? 14:56:41

12               A       Yes. 14:56:43

13               Q       What do you recall about -- did you meet 14:56:43

14       with Johns Hopkins at any point? 14:56:45

15               A       Yes. 14:56:48

16               Q       What do you recall about that meeting? 14:56:48

17               A       I could describe the gentleman to you 14:56:56

18       because I remember specifically what he looked like, I 14:56:57

19       believe he was the director of sourcing or the VP of 14:57:00

20       supply chain, and forgive me for not remembering his 14:57:04

21       title specifically, that meeting was teed up by the 14:57:08

22       Vizient director that -- the client executor that 14:57:13

23       managed that relationship with Johns Hopkins, and they 14:57:17

24       told them that they had a vendor that had a cost 14:57:19

25       savings program around robotic surgery. 14:57:21